

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Debtor.

Case No.: 24-30167
Chapter 7

STIPULATION TO ALLOW SALE OF CO-OWNED PROPERTY
PURSUANT TO 11 U.S.C. § 363(h)

Erik A. Ahlgren, trustee for the Chapter 7 Bankruptcy Estate of Pro-Mark Services Inc. ("Trustee"), and Hartford Accident and Indemnity Company ("Hartford") stipulate and agree as follows:

1. On November 14, 2024, Trustee filed a motion with this Court seeking to sell a 2008 MEC 3772 RT Man Lift, a 2007 SkyJack SJIII3219 Scissor Lift, and a 2010 Mark Line Industries Office Trailer (VIN: IN040818) to Steve Anderson of Devils Lake, North Dakota for \$6,000.00 (the "Sale"). *DE # 165.*
2. Hartford has objected to the Sale based on a claimed interest in the assets proposed to be sold. *DE # 196-1 and 200.*
3. Capital Credit Union ("CCU") has commenced an adversary proceeding, which proceeding will address the competing interests of Hartford and CCU. *DE #202; Adv. Pro. #25-07001.*
4. Hartford hereby waives its objection to the sale; provided, however, Hartford does not waive any claim to the proceeds from the Sale.

5. The \$6,000.00 from the Sale will be held by Trustee in the bankruptcy estate's trust account pending further court order pending the conclusion of Adv. Pro. #25-07001.

6. In light of the foregoing, the parties respectfully request that the Court vacate the hearing set for set for Friday, January 17, 2025 at 10:00 AM (Doc. 199).

7. Pursuant to Local Rule 9011-4(f), the parties authorize the filing of this stipulation using their respective electronic signatures.

Dated: January 15, 2025

The Hustead Law Firm
A Professional Corporation

/s/ Connor L. Cantrell
Connor L. Cantrell, Esq. The
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ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January, 2025 a true and correct copy of the foregoing UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE OBJECTION TO SALE OF ESTATE ASSETS was electronically filed with the Court & served to the following:

Erik A. Ahlgren, Trustee
220 W Washington Ave Ste 105
Fergus Falls MN 56537
erik@ahlgrenlawoffice.net

*Original Signature is on File at The Husted
Law Firm, A Professional Corporation*

s/ Connor L. Cantrell
Connor L. Cantrell, Esq.